



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

02-OSR-0314

Mr. Ron F. Naventi, Project Manager
Bechtel National, Inc.
3000 George Washington Way
Richland, Washington, 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 – OFFICE OF SAFETY REGULATION (OSR)
APPROVAL OF BECHTEL NATIONAL, INC (BNI) AUTHORIZATION BASIS CHANGE
NOTICE 24590-WTP-ABCN-ESH-01-024, REVISION 1

- References:
1. BNI letter from A. R. Veirup, BNI, to M. K. Barrett, ORP, "Transmittal for Information - Authorization Basis Change Notice 24590-WTP-ABCN-ESH-01-024, Revision 0, *Radiation Protection Program (RPP) Document Number and Editorial Changes*," CCN 024508, 01-OSR-0521, dated December 27, 2001
 2. OSR letter from R. C. Barr, OSR to R. F. Naventi, BNI, "Office of Safety Regulation (OSR) Response to Contractor Initiated Changes to the Radiation Protection Program (RPP), per Authorization Basis Change Notice (ABCN) 24590-WTP-ESH-01-024, Revision 0," CCN 029006, 02-OSR-055, dated February 19, 2002
 3. BNI letter from A. R. Veirup, BNI, to M. K. Barrett, ORP, "Transmittal for Information: Authorization Basis Change Notice 24590-WTP-ABCN-ESH-01-024, Revision 1, 'Radiation Protection Program (RPP) Document Number and Editorial Changes'," CCN 030598, 02-OSR-0225, dated May 22, 2002

The U.S. Department of Energy, Office of River Protection, OSR has reviewed ABCN 24590-WTP-ABCN-ESH-01-024, Revision 1. The submittal contained the update to the Radiation Protection Program for Design and Construction (RPP) required by 10 CFR 835.101(g)(1), "Radiation Protection Program."

ABCN 24590-WTP-ABCN-ESH-01-024, Revision 0, (Reference 1) proposed minor changes to the RPP consisting of the following: (1) the document number was revised to reflect the new BNI "24590-WTP-..." numbering system; (2) RPP references to the Quality Assurance Manual, Waste Treatment Plant Radiological Control Manual, and RPP-WTP Occupational ALARA Program were updated; (3) typographical errors were corrected; (4) minor editorial changes were made; (5) Appendices B and C were deleted since they were no longer relevant. The ABCN described these changes as editorial, but the changes did not meet the Quality Assurance Manual definitions of editorial changes. Subsequently, the OSR responded, in Reference 2, to

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ABCN-24590-WTP-ABCN-ESH-01-024, Revision 0, by requesting that BNI resubmit the ABCN to correct inconsistencies with the AB change process. BNI resubmitted the ABCN by Reference 3.

Based on OSR's evaluation of the revised ABCN (Reference 3), OSR has found the proposed changes acceptable and approves the RPP, 24590-WTP-ESH-01-001, Revision 0. OSR concluded that there is reasonable assurance that the revised RPP will protect the occupational radiological health and safety of workers, and that the revised RPP complies with applicable laws, regulations, and RPP-WTP contractual requirements. Attached is OSR's Safety Evaluation Report for the proposed changes.

If you have any questions, please contact me or Ms. Jeanie Polehn, of my staff, (509) 372-0787. Nothing in this letter should be construed as changing the Contract, DE-AC27-01RV14136. If, in my capacity as the Safety Regulation Official, I provide any direction that your company believes exceeds my authority or constitutes a change to the Contract, you will immediately notify the Contracting Officer and request clarification prior to complying with the direction.

Sincerely,

Robert C. Barr
Safety Regulation Official
Office of Safety Regulation

OSR:JLP

Attachment

**Safety Evaluation Report (SER)
Of Proposed Authorization Basis Change Notice
24590-WTP-ABCN-ESH-01-024, Revision 1
For the River Protection Project-Waste Treatment Plant
By the Office of Safety Regulation**

1.0 INTRODUCTION

Bechtel National, Inc. (BNI) is the Contractor for the River Protection Project Waste Treatment Plant (RPP-WTP) under Contract No. DE-AC27-01RV14136 between the U. S. Department of Energy (DOE) and BNI. The RPP-WTP authorization basis (AB) is the composite of information, provided by the Contractor in response to radiological, nuclear, and process safety requirements, that is the basis on which the Office of Safety Regulation (OSR) Safety Regulation Official grants permission to perform regulated activities. The AB includes that information requested by the Contractor for inclusion in the AB and subsequently accepted by OSR. The AB for the RPP-WTP includes the *Radiation Protection Program (RPP) for Design and Construction*¹. The RPP provides a description of the plans and measures for achieving compliance with the requirements of 10 CFR 835, the DOE regulation on Occupational Radiation Protection. By letter dated December 27, 2001,² and letter dated May 22, 2002³, the Contractor submitted proposed changes to the RPP. The OSR evaluated Revision 0 of the BNI RPP transmitted as Authorization Basis Change Notice (ABCN) 24590-WTP-ABCN-ESH-01-024. This SER documents OSR's evaluation of the proposed RPP changes contained in the subject ABCN.

2.0 BACKGROUND

The original ABCN, (Revision 0) was transmitted for information only to the OSR on December 27, 2001. The Contractor stated in its letter that the changes to the RPP were editorial or administrative in nature, reflecting the new "24590-WTP-..." document numbering system, and that there was no impact on the RPP-WTP safety basis. OSR performed a review of the proposed changes to the RPP and found the proposed changes continued to meet the requirements of 10 CFR 835, and agreed with the Contractor that there was no impact on the RPP-WTP safety basis. However, OSR found that in making the proposed changes, BNI had not followed the AB change process in all instances. BNI made changes to the RPP that did not meet the definition of editorial changes as defined in the Quality Assurance Manual⁴, yet stated that many of the changes were editorial or administrative in nature. Also, changes were made to

¹ BNI Document, 24590-WTP-RPP-ESH-01-001, *Radiation Protection Program for Design and Construction*, Revision 0, dated December 11, 2001.

² CCN: 024508, BNI Letter, 02-OSR-0521, Transmittal for Information: ABCN 24590-WTP-ABCN-ESH-01-024, Rev. 0, Radiation Protection Program (RPP) Document Number and Editorial Changes, dated December 27, 2001.

³ CCN: 030598, BNI Letter, 02-OSR-0225, Transmittal for Information: ABCN 24590-WTP-ABCN-ESH-01-024, Rev. 1, Radiation Protection Program (RPP) Document Number and Editorial Changes, dated May 22, 2002.

⁴ BNI Document, 24590-WTP-QAM-QA-01-001, *Quality Assurance Manual (QAM)*, Revision 0a, January 2, 2002, Policy Q-06.1, "Document Control," Section 3.4, "Minor Document Changes."

the RPP that resulted in inconsistencies with the Safety Requirements Document (SRD)⁵ and the Integrated Safety Management Plan (ISMP)⁶. OSR transmitted a letter⁷ requesting that the ABCN be revised within 60 days of receipt of the letter. The Contractor transmitted Revision 1 of the ABCN on May 22, 2002. This transmittal provided several references to ABCNs that corrected inconsistencies in the SRD and the ISMP. This included correcting inconsistent quality assurance related terminology, and references to 10 CFR 830, Subpart A.

The OSR reviewed the RPP, Revision 0 to confirm it continued to:

- Meet review Criteria (a) and (b) in RL/REG-98-11, *Guidance for the Review of the RPP-WTP Contractor Radiation Protection Program Document Required by 10 CFR 835, Occupational Radiation Protection*⁸;
- Address all applicable requirements, including 10 CFR 835;
- Contain acceptable measures for achieving compliance with the requirements, with consideration of previous Contractor responses to questions posed by OSR.

The revised ABCN (24590-WTP-ABCN-ESH-01-024, Revision 1) and RPP, Revision 0 were reviewed against OSR Management Directive 3.4, *Processing Authorization Basis Amendment Requests*⁹, to ensure that:

- Changes to the AB (RPP Revision 0) did not adversely affect the health and safety of the public or workers;
- Changes to the RPP were consistent with applicable laws, regulations, and RPP-WTP contractual requirements;
- Changes to the AB (RPP Revision 0) did not introduce inconsistencies with Top-Level Standards or conflict with other AB requirements.

This SER documents the results of both the review of the RPP, Revision 0 and the revised ABCN (Revision 1).

⁵ BNI Document, 24590-WTP-SRD-ESH-01-001-02, *Safety Requirements Document*, Volume II, Revision 1, dated June 6, 2002.

⁶ BNI Document, 24590-WTP-ISMP-01-001, *Integrated Safety Management Plan*, Revision 1a, dated June 6, 2002.

⁷ CCN: 029006, OSR Letter, 02-OSR-0055, "Contract No. DE-AC27-01RV14136 – Office of Safety Regulation (OSR) Response to Contractor Initiated Changes to the Radiation Protection Program (RPP), Per Authorization Basis Change Notice (ABCN) 24590-WTP-ABCN-ESH-01-024, Revision 0," dated February 19, 2002.

⁸ OSR Document, RL/REG-98-11, *Guidance for the Review of the RPP-WTP Contractor Radiation Protection Program Document Required by 10 CFR 835, Occupational Radiation Protection*, Revision 2, dated November 17, 2000.

⁹ OSR Document, RL/REG-97-05, OSR Management Directive 3.4 – *Processing Authorization Basis Amendment Request*, Revision 1, dated January 25, 2001.

3.0 EVALUATION

Proposed changes to the RPP:

Description of Changes:

- (1) the document number was revised to reflect the new BNI “24590-WTP-...” numbering system;
- (2) RPP references to the Quality Assurance Manual, Waste Treatment Plant Radiological Control Manual, and RPP-WTP Occupational ALARA Program were updated;
- (3) typographical errors were corrected;
- (4) minor editorial changes were made;
- (5) Appendices B and C were deleted since they were no longer relevant.

Evaluation: (Acceptable)

The proposed changes were acceptable because they were not a reduction in commitment or effectiveness of the RPP and did not result in inconsistencies with Top-Level Standards or conflict with other AB requirements.

4.0 CONCLUSIONS

The reviewers determined that the RPP, Revision 0, continued to meet the review criteria established in the OSR review guidance document. The reviewers found that the RPP addressed all applicable requirements of 10 CFR 835 and contained acceptable measures for achieving compliance with the requirements. Revision 1 of ABCN 24590-WTP-ABCN-ESH-01-024 corrected inconsistencies in accordance with the AB change process. Therefore, the OSR approves the associated 24590-WTP-ABCN-ESH-01-024, Revision 1 and the associated RPP, Revision 0.